UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SHABTAI SCOTT SHATSKY, et al.,

Plaintiffs,

Case No. 18-cv-12355 (MKV)

v.

THE PALESTINE LIBERATION ORGANIZATION and THE PALESTINIAN AUTHORITY,

Defendants.

NOTICE OF MOTION AND MOTION TO WITHDRAW PRO HAC VICE APPEARANCE OF ERICA C. LAI AS COUNSEL FOR PLAINTIFFS

Pursuant to Local Civil Rule 1.4, Erica C. Lai ("Counsel") respectfully moves this Court for an order granting leave to withdraw as counsel of record for Plaintiffs in the above-captioned action. In support of this motion, Counsel states as follows:

- 1. A Motion For Admission Pro Hac Vice for Erica C. Lai was submitted to this Court on behalf of Plaintiffs on April 13, 2021. (Dkt. No. 72.) That Motion was granted by the Court on April 14, 2021. (Dkt. No. 73.)
- Counsel will no longer be associated with Cohen & Gresser LLP as of June
 4, 2021 and will no longer serve as counsel for Plaintiffs in this action.
- 3. Granting this motion will not unduly prejudice any party and will not delay the pending litigation. The parties are currently engaged in jurisdictional discovery through July 9, 2021. (Dkt. No. 80). Defendants' contemplated dispositive motions are not due until July 30, 2021, with Plaintiffs' responses due by August 20, 2021. (*Id.*)
- 4. All other attorneys who have appeared on behalf of Plaintiffs will continue to represent them in this action.

5. Counsel is not asserting a retaining or charging lien.

For these reasons, Counsel respectfully asks the Court to enter an order withdrawing her as counsel of record for Plaintiffs in this action.

Dated: June 4, 2021 Washington, D.C.

Respectfully submitted,

/s/ Erica C. Lai

Erica C. Lai (admitted pro hac vice) 2001 Pennsylvania Avenue, NW Suite 300 Washington, DC 20006 (202) 851-2070 elai@cohengresser.com

Attorney for Plaintiffs

To: All Plaintiffs

cc: All counsel of record via ECF